

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

STUDENTS FOR FAIR ADMISSIONS, INC.,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF HARVARD
COLLEGE (HARVARD CORPORATION),

Defendant.

Civil Action No. 1:14-cv-14176-ADB

**REQUEST FOR
ORAL ARGUMENT**

PLAINTIFF'S MOTION TO COMPEL PRODUCTION

Pursuant to Local Rules 7.1(b) and 37.1, Plaintiff, Students for Fair Admissions, Inc. ("SFFA"), hereby moves this Honorable Court for an order compelling Defendant, the President and Fellows of Harvard College ("Harvard"), to comply with certain Requests for Production of Documents SFFA served on Harvard ("Requests"). Specifically, SFFA seeks an order requiring Harvard to provide (a) a preliminary sample of 6,400 application files consistent with Request No. 24, (b) the names of a subset of alumni interviewers as set forth in Request No. 19, and (c) documents regarding Harvard's transfer admissions process on the same terms Harvard produces information regarding its freshman admission process.

In support thereof, SFFA relies upon the accompanying Memorandum of Law (including exhibits appended to the declaration from SFFA's counsel).

WHEREFORE, SFFA respectfully requests that the Court enter a 20-day order compelling Harvard to: (a) comply fully with Requests Nos. 19 and 24; (b) to produce documents regarding its transfer admissions process on the same terms it produces

information regarding its freshman admission process in response to the Requests; and (c) grant such other and further relief as the Court sees fit.

Respectfully submitted,

By: /s/ William S. Consovoy
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Dated: July 16, 2015

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*Counsel for Plaintiff Students for Fair
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CERTIFICATE OF CONFERENCE

In accordance with Local Rules 7.1(a) and 37.1, I hereby certify that I conferred and attempted in good faith to resolve or narrow the issues set forth in this motion with Defendant's counsel, including via telephone on June 23, 2015, and subsequent e-mail correspondence.

/s/ Patrick Strawbridge
Patrick Strawbridge

CERTIFICATE OF SERVICE

In accordance with Local Rule 5.2(b), I hereby certify that this document was filed through the Court's ECF system on July 16, 2015 will be sent electronically to the registered participants identified on the Notice of Electronic Filing.

/s/ Patrick Strawbridge
Patrick Strawbridge

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